

June 8, 1999

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Dockets Management Branch  
The Food and Drug Administration  
Department of Health and Human Services, Rm. 1-23  
12420 Parklawn Dr.  
Rockville, MD 20857

Re: 99P-1340/CP 1  
Petition to Have "Eternity eau de parfum" Misbranded

Dear Sir or Madam:

As president of the Environmental Health Network, the sponsoring organization for the above petition, I have already sent you a letter on behalf of our board of directors. I wish to add my own comments here as a private citizen. I urge your thoughtful and lawful consideration of the contents of this petition, as mandated by your own regulations 21CFR Sec. 740.1, 21CFR Sec. 740.2, and 21CFR Sec. 740.10.

Perhaps you will understand the urgency of our petition in this context. Several decades ago, people protesting against public tobacco use were ignored and ridiculed, treated as crackpots or lunatics. They were in a position similar to those people today who are suffering from the effects of widespread, public fragrance use and who trying desperately to be heard by anyone who could be of help. Complaints sent to doctors, medical associations, employers, government agencies, newspaper editors, even to the fragrance industry itself, are almost universally ignored.

Like tobacco smoke, fragrances and fragrance products containing synthetic chemicals:

- are marketed to people who want to feel glamorous, sexy and "cool;"
- are often repeatedly used throughout the day, allowing small amounts of harmful substances to be absorbed into the users' body;
- cause harm to other people in the immediate vicinity, through "off-gassing" of toxic fumes. These fumes are immediately harmful to people with asthma and multiple chemical sensitivities (MCS); and
- cause immediate deterioration of air quality, indoors and out.

In addition to being health hazards, tobacco smoke and heavy fragrances are often considered unpleasant and annoying in public settings--not glamorous or cool at all. People who do not use these products themselves often object to being forced

into smelling them at restaurants, theaters, other recreational settings, and in the workplace and at schools. You don't have to have asthma or MCS to object to tasting "Eternity" instead of your sushi, or to smelling "Giorgio" instead of wholesome fresh air.

Unfortunately, people who use these products often insist they have a "right" to use them in any setting, regardless of how unpleasant or dangerous these products may be for themselves or anyone else. Ironically, thanks to a massive public education campaign and regulations against smoking in many public settings, many smokers have become far more considerate than most fragrance users.

There are other parallels I must mention. Like the tobacco industry, the fragrance industry has attempted to gain a foothold with teens and children. Miss Piggy, of Muppet fame, has her own signature fragrance, "Moi." You can't tell me this is a product designed to appeal to a supposedly sophisticated adult. No, Miss Piggy has become the Joe Camel of the fragrance industry--and Jim Hensen, her creator, if still alive, would be writhing with shame if he knew what harmful substances are polluting the lungs and fatty tissues of her innocent fans as a result.

Parents who are otherwise extremely cautious about food, clothing and other products they purchase for their children enthusiastically buy synthetically scented lotions, shampoos, baby wipes, diapers and even toys. (I saw a vanilla scented ball for toddlers in a Discovery Toys catalog just yesterday.) Even children with asthma are subjected to these products. This is because the parents are lulled into thinking these products are safe. They are readily available and there are no warning labels.

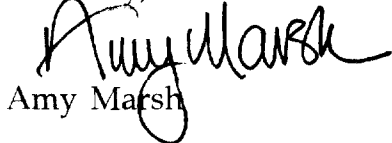
This is a tragedy in the making, and even more tragic for being preventable. I live in a neighborhood with many new families. I see so many small children at the mercy of an adult reeking of neurotoxic fragrance chemicals. When do these children ever get to breathe real fresh air? Their parents and babysitters are scented and toxic, their homes are full of "air fresheners" and scented cosmetics and cleaning products. Even their clothing is contaminated by heavily scented dryer sheets and detergents. I fear for the health of these children, who are absorbing these chemicals through their lungs and skin. I fear that asthma, brain damage, chemical sensitivities, allergies, and behavioral and learning difficulties will be the inevitable result. Perhaps even the increase in childhood cancers might be partially related to this unrelenting exposure to toxic chemicals and chemical combinations.

I am aware of several studies on the toxicity of fragrance products, but to my knowledge they have not been published in pediatric journals. Even though the American Medical Association and the American Lung Association now list fragrances as "asthma triggers," I wonder how many doctors have time to search these websites. Certainly the HMO I belong to is not notifying new parents or asthma patients about the hazards of these products.

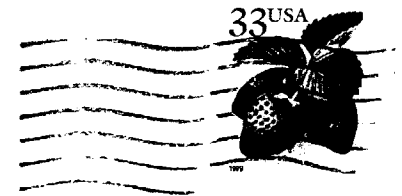
In conclusion, tobacco and fragrance products are both manufactured by industries who would prefer not to be held accountable for the adverse affects of their products. These industries spend considerable amounts of time and energy influencing the general public and public servants through advertising, lobbying, and questionable "scientific studies" paid for by industry groups. Like the tobacco industry in the not so distant past, I suspect the fragrance industry has been suppressing information and is now playing for time--hoping to rake in as much profit as possible before facing the inevitable results of its careless and deliberate erosion of public health.

Please act to restore and protect the health of the American public, and make this petition a priority. My own experience, and that of many other people I have spoken with, tell me that most fragrance products are currently dangerous. Consumers need to be warned, and the industry needs to develop safe formulations.

Sincerely,

  
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